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IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

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UNITED STATES OF AMERICA,

Plaintiff,

vs.

RALPH DAVID BRINTON,

Defendant.

Case No. 2:19cr80

NOTICE OF HANDWRITING EXPERT  
WITNESS

Judge Howard C. Nielson, Jr.

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Plaintiff United States of America, in compliance with its obligations under Federal Rule of Criminal Procedure 16(a)(1)(E), to provide notice and a summary of the testimony of expert witnesses whom the government currently intends to use during its case-in-chief at trial. Please be advised of the following witness, his qualifications, and his anticipated testimony:

Brain Wickhorst.

A. **Qualifications (Fed. R. Evid. 702):** Ms. Wickhorst's qualifications as handwriting examiner are set forth in detail in the Curriculum Vitae as Attachment A. Mr. Wickhorst has been a handwriting examiner for more than 30 years having successfully obtained a two-year certification course and a two-year Masters Certificate with the International Graphoanalysis Society in Chicago, Illinois.

He belongs to a number of professional organizations including the National Association of Document Examiners, World Association of Document Examiners and American Society of Industrial Security.

Mr. Wickhorst was first qualified as an expert handwriting examiner in 1987 with the Court of Queens Beach, Canada and the majority of his work has involved the examination of handwriting and signatures. He is currently employed as a handwriting and document examiner at Grapho-Analytical, Inc. in High River, Canada

B. **Opinion Testimony (Fed R. Evid. 704):** Mr. Wickhorst's opinion about whether Blum's signature is contained on the bankruptcy documents – Application for Individuals to Pay Filing Fees in Installments, Declaration about an Individual Debtor's Schedules, Voluntary Petition for Individuals filing for Bankruptcy and Chapter 13 Plan -- filed in the case of *In re Richard Gibson Blum*, Case No. 17-23452, will be consist with the written report he has prepared, a copy of which is attached as Attachment B.

C. **Bases and Reasons in Support of Mr. Wickhorst's Opinion Testimony (Fed R. Evid. 703 & 705):**

The basis and reasons for his opinions will be his knowledge as a court qualified handwriting examiner, his review of the bankruptcy documents, premised upon his extensive

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experience and training as handwriting examiner.

Dated this 15th day of July, 2019.

JOHN W. HUBER  
United States Attorney

*/s/ Cy H. Castle*

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Cy H. Castle  
Assistant United States Attorney  
Peter Kuhn  
Special Assistant United States Attorney

CERTIFICATE OF MAILING

I hereby certified that I mailed, first class, the attached Notice of Hand Writing Expert

Witness on this 15<sup>th</sup> day of July, 2019 to the following:

Stephen Homer  
2877 West 9150 South  
West Jordan, Utah 84088

*/s/ Ianeat Mesa*

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Ianeta Misa  
Legal Assistant

ATTACHMENT A

# *Brian Wickhorst*

*handwriting examiner*

Box 6060 High River, Ab., Canada T1V 1P7  
Phone: (403) 701-4951 [brian@e3consultants.com](mailto:brian@e3consultants.com)

## *Curriculum Vitae - Statement of Qualifications*

### **TRAINING:**

- \* I.G.A.S. (International Graphoanalysis Society), Chicago, Ill.
  - 2 year certification course.
  - 2 year Masters Certificate. Completed 1987Graphoanalysis is the study of the individual strokes of handwriting.

\* Training also consists of extensive readings of various professional textbooks, journals and research papers. I have a personal library of reference books and journals from the various professional organizations that I belonged to.

National Association of Document Examiners  
World Association of Document Examiners  
American Society of Industrial Security

### **EXPERIENCE and areas of EXPERTISE:**

- I was first court qualified in 1987, in the Court of Queens Bench.
- I have been involved with a wide variety of cases and situations in which questioned signature and / or writings were involved. The majority of my work has been involved with the examination of handwriting and signatures.
- I have worked for numerous Crown Corporations, oil companies, police services, law firms, public and private corporations the Alberta Law Society and private individuals. I have specialized in investigative work in relationship to questioned handwriting and signatures in identifying the authors of questioned letters and documents.
- I have an expertise in the area of personality profiling in relationship to handwriting in threat letters (death, personal harm, destruction, sexual harassment, etc) and other such writings of concern. I have successfully identified the authors of such documents for police departments, oil companies, rail companies, universities and many more organizations in numerous cases over the years.
- I worked / consulted with a physiatrist who specialized in treating concussion patients. I monitored the neurological behavior changes in their handwriting during their treatment.
- I worked / consulted with a psychologist that specialized in the treatment of Multiple Personality Disorder.
- I have a 7 ½ year background in criminology and worked with Corrections Canada at a maximum institution as a case worker doing assessments.

ATTACHMENT B



handwriting & document examiner - consultants  
box 6060 High River, Ab. T1V 1P7  
www.e3consultants.com

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OUR FILE: 190120-1

DATE: 19 JAN 2019

ATTN: Michael Labertew

RE: Richard Blum Signatures

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**PURPOSE:**

This report has been prepared to:

Report the results of an examination and comparison of 4 questioned signatures on various documents that pertain to a filing for bankruptcy on 24 April 2017, to 13 known signatures of Richard Blum.

**DESCRIPTION OF DOCUMENTS:**

**Questioned Signature:** The questioned signatures are:

- Q1 Is on the Application for Individuals to Pay Filing Fees in Installments, dated April 24, 2017
- Q2 Is on Declaration About an Individual Debtor's Schedules, dated April 24, 2017
- Q3 Is on Voluntary Petition for Individuals Filing for Bankruptcy, page 6, dated April 24, 2017
- Q4 Is on Chapter 13 Plan document, page 5, dated April 24, 2017

**Standards of comparison:**

- K1/ US Social Security Card, issues in 1986 or 1987, digital picture of card
- K2/ One page with 12 sample signatures, produced in my presents on 13 Jan, 2019

**OBSERVATIONS OF THE QUESTIONED SIGNATURES**

To prepare the signatures for examination I scanned all the signatures and digitally copied them all on one page so that each of them where approximately 4 inches wide and on the same page. Line values and details were preserved as per the original sized copies that I was provided for examination.

My first impression of the questioned signatures was that the poor line values indicate one of two things.

- 1- The author has a degenerative neurological condition, or
- 2- The signatures were attempted forgeries.

The poor line values indicate that the signatures were produced in a slower speed then what would be in a normal signing. The lines are not fluid or natural in movement. This is common in signatures that are forged freehand.

It also appeared that the known signature of Mr. Blum on the Social Security card was used as the sample signature to copy or reproduce. The large initial letter and the final star like formation are the only two points of basic structure that are common in the questioned signatures and a known signature of Mr. Blum.





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Just as a point of interest, apparently Mr. Blum does not suffer from any neurological condition that would affect his writing skills, as is indicated in the 12 samples that he produced for me to use as known samples of his signature.

In comparing the structural form of the 4 questioned signatures to the known signature on the SS card, they differ in most all points that we use to compare signatures or writing samples. These include line value, slant, habits of formations, spacing, initial and termination points, and more. The initial letter is written more like a letter D rather than in the form of an R. The following three spiked formations that look like a malformed M, do not look like the known signature in any way at all. Not only are the line values poor but there are hesitation points that are commonly found in freehand forgeries.

#### POINT OF INTEREST

It is obvious that the signature on the US SS card was used as a signature to be reproduced by the writer. The issue with using this signature to copy is that it is 32 years old. It is a fact that our signatures change over time and evolve as we mature.

When I compare the new samples of Mr. Blum's signatures to the one on the card, I can see the natural evolution or changes that occurred in his writing and his signature over the last 32 years. I can see the same basic patterns of behavior in the samples. But the same patterns and behaviors in the questioned signatures are absent. They are not common in any way.

The first mistake made by the author of the forged signatures was using an old signature to copy from. The second was not practicing the signature to be copied. He hesitated too much and did not produce the proper line formations as in the known signature.

#### CONCLUSION

After examining the questioned signatures and comparing them to known signatures of Mr. Blum, it is my opinion that the Mr. Blum is not the author of the questioned signatures on the various documents as listed above. Of this I have absolutely no doubt of this fact.

All the signatures are poor quality forgeries.

LEVEL OF CERTAINTY: 100%

Please contact the writer with any questions that you might have about this letter of findings and the opinions expressed.

Yours in Service

Brian Wickhorst  
Court Qualified Handwriting Examiner  
Profiler - Consultant  
High River, Ab. Canada  
403 701-4951  
brian@e3consultants.com

Under penalty of perjury, I declare that I  
may be affected.

X

**Richard Gibson Blum**  
Signature of Debtor 1

OS1

Under penalty of perjury, I declare that I  
that they are true and correct.

X

**Richard Gibson Blum**  
Signature of Debtor 1

OS2

By signing here, I acknowledge that  
this notice, and I am aware that I  
not properly handle the case.

**Richard Gibson Blum**  
Signature of Debtor 1

OS3

I:

**Richard Gibson Blum**

OS4



DOUGLAS SHERIDAN

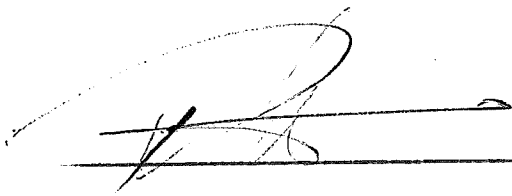
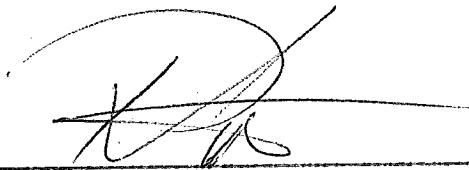
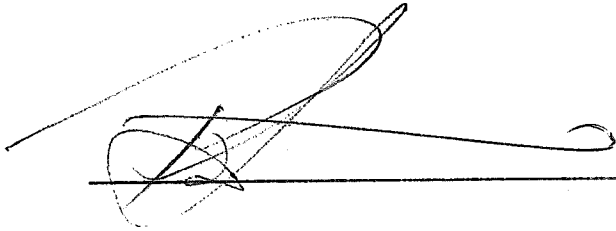
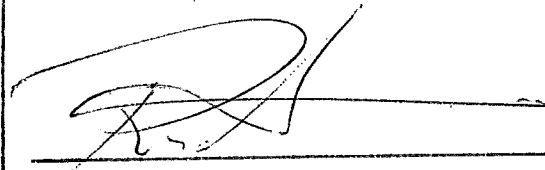
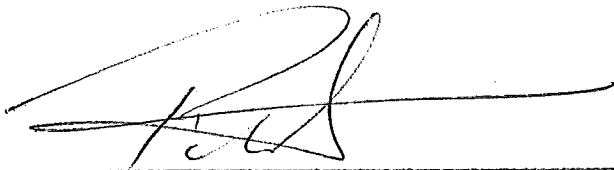
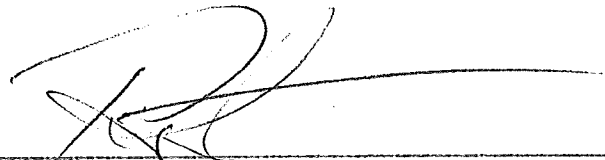
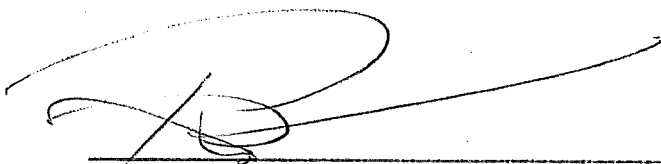
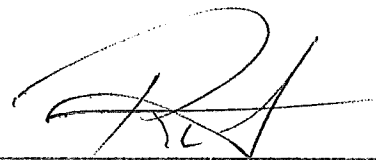
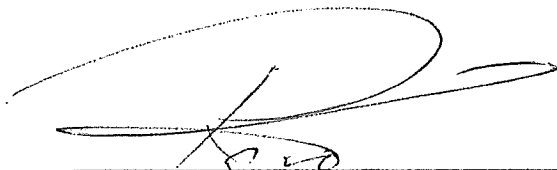
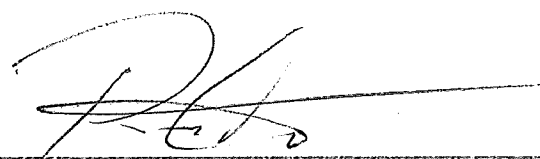
103-70-0599

THIS NUMBER HAS BEEN ESTABLISHED FOR

RICHARD G BLUM

SIGNATURE

*[Handwritten signature]*

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7 13 Jan 2019 By